

Exhibit 1B
Deposition Excerpts – Richard Kiebusch

1 **clinicians and communication among them about him.**

2 Q. And do you have an idea, Doctor, as to how
3 long during that 15-day stay that his mental health
4 and suicide risk were of concern to Alexander?

5 **A. No.**

6 MR. PERRIN: Gretchen, if you can pull
7 up Exhibit Number 7, please.

8 (DEPOSITION EXHIBIT
9 NUMBER 7 WAS MARKED
10 FOR IDENTIFICATION)

11 Q. (Mr. Perrin) Doctor, now in front of you --
12 and I -- you probably don't have this. These are
13 records from Alexander where Mr. -- well, it's prior
14 to coming to the Mecklenburg County Sheriff's Office.
15 And I have a few questions for you.

16 **A. Okay.**

17 Q. If you will scroll down on Number 1. That
18 seems to indicate -- and if you look up top, this is
19 from --

20 MR. PERRIN: I don't know if I have
21 access to this, Gretchen, or not.

22 Q. (Mr. Perrin) But this is actually a
23 document from November 5th, 2020. Is that correct?

24 **A. Looks like it. Yes.**

25 Q. And that's -- your understanding is, that's

1 when he came to be -- to Alexander from the sheriff's
2 office in ---

3 **A. My -- yes. My understanding is, he arrived**
4 **there on November 5th.**

5 Q. Okay.

6 **A. When this document was completed, I don't**
7 **know.**

8 Q. Got you. Fair enough.

9 MR. PERRIN: If you will go down,
10 Gretchen.

11 Q. (Mr. Perrin) And it looks like Mr. -- D.W.
12 was put on alert versus a watch. Is that your
13 understanding at least from reading that?

14 **A. Yeah. "Alert" is circled. Yes.**

15 Q. Okay.

16 MR. PERRIN: And then if you'll go to
17 the next page.

18 Q. (Mr. Perrin) All right. And again, this --
19 would agree that this is the November 5th entry from
20 what I think we would all agree is from what's called
21 NC Join, but this indicates that D.W. was put on
22 suicide alert on November 5th, correct?

23 MR. PERRIN: If you just -- Gretchen,
24 if you just go down towards the bottom.

25 **THE WITNESS: Yeah.**

1 **THE WITNESS: Where is that?**

2 Q. (Mr. Perrin) See right there?

3 **A. Okay. I see it now.**

4 Q. Okay. It looks like, at least on this form,
5 suicide ideation is normal as of November 5th, 2020.
6 Is that right?

7 **A. I guess. Yeah.**

8 Q. Okay.

9 **A. It looks like ---**

10 Q. And if you go to the next -- if you'll go to
11 the next page with me, this would be an entry by Mr.
12 Charles Moore, November 7th, and it indicates that no
13 suicide supervision is required. Is that right?

14 **A. That's what it says. Yes. Uh-huh.**

15 Q. Okay. And then if you will go with me to
16 the next page, that -- and just out of clarity, that
17 is the NC Join entry which is the same entry as
18 earlier. That is November 7th by Mr. Moore, no
19 supervision -- no suicide supervision is required,
20 right?

21 **A. That's what it says. Yes.**

22 Q. Okay.

23 MR. PERRIN: And then if we can go
24 several pages down, Gretchen, I think just two pages
25 later. Actually, one more page, please. Yeah.

1 Q. (Mr. Perrin) This is an entry for D.W. from
2 September 9th, and ---

3 A. November 9th.

4 THE COURT REPORTER: November 9th.
5 Yep.

6 Q. (Mr. Perrin) I'm sorry. I said September.
7 My fault. November 9th. It indicates that D.W. is
8 within normal limits except his mood is sad, right?

9 A. She -- Gretchen would have to move that up a
10 bit, but I think I saw the word "sad." Yeah.
11 Uh-huh.

12 Q. Okay. And then the next page, if you go
13 with me, appears to be November 10th, 2020. I got it
14 right this time. By D.W., again, everything is within
15 normal limits except his mood is flat and anxious,
16 correct?

17 A. That's what it says. Yes.

18 Q. All right. And then the last page, I hope,
19 this is sort of the last document that -- actually,
20 that's not true.

21 Second to last document I want to ask you
22 about, Doctor, but it's fair to say here that from
23 November 9th on this side, where it says to November
24 19th, 2020, the only time that anyone from Alexander
25 was concerned would have been on the 9th and 10th,

1 correct?

2 A. I guess. Yes. Yes. It's the only time
3 which I see a "yes" ---

4 Q. And so ---

5 A. --- circled here.

6 Q. And so -- and so his status is within normal
7 limits from November 9th to November 19th, right?

8 A. I guess November -- I guess so, Sean. I
9 guess.

10 Q. And so -- which leads me to then go back
11 to --

12 MR. PERRIN: And you don't -- Gretchen,
13 you can just stay here, if it's okay.

14 Q. (Mr. Perrin) The fact that you said his
15 general mental health and suicide risk were sources of
16 continued concern for Alexander. It appeared to me --
17 it appears to me from reviewing his records that, in
18 fact, he was within normal limits for most of his time
19 at Alexander, right?

20 A. My recollection of the -- like I said
21 before, the notes of the clinicians and the
22 communication between them led me to believe that his
23 suicide risk and his general mental health were
24 sources of continuing concern.

25 And I see what you're putting in front of me

1 cell twice but didn't look towards the vision panel.

2 Is that right?

3 A. This is when he returned from lunch. Yes.

4 Q. Yes, sir.

5 A. You are correct.

6 Q. And then 1:08, Weller walks past the cell

7 again and appears to spray a substance on a door

8 handle, right?

9 A. Right.

10 Q. And then 1:10, again, he walked past and, I

11 guess, is continuing to spray something at 1:10,

12 right?

13 A. Correct. He was wiping it clean at 1:10.

14 Q. I'm sorry?

15 A. He was wiping it clean at 1:10.

16 Q. I got you. And then at 1:18 and 1:29,

17 Weller goes by again but doesn't look towards the

18 vision panel?

19 A. Correct.

20 Q. And then at 1:43, Weller goes by the cell

21 and glances momentarily at the vision panel?

22 A. Correct.

23 Q. Okay. Doctor, have you ever been sued?

24 A. Yes.

25 Q. All right. And, again, I don't care about